

AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. Application No. 10/067,517
Attorney Docket No. Q68458

REMARKS

Upon entry of the present Amendment, claims 1-18 are pending in the application. Claims 1-12 and 14-18 are amended. Claims 19 and 20 are cancelled without prejudice or disclaimer. No new matter is presented.

To summarize the Office Action, claims 19-20 have been rejected under 35 U.S.C. § 101 for allegedly lacking utility, claims 1-4, 8-13 and 17-20 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Sawada (U.S. Patent No. 6,735,619), and claims 1-2, 8-11 and 17-20 have been rejected under 35 U.S.C. § 102(a) as being anticipated by Garrison (U.S. Patent No. 6,275,939).¹ Further, the Examiner indicates that claims 5-7 and 14-16 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all the limitations of the respective base claim and any intervening claims. The outstanding rejections are addressed below.

Claim Rejections - 35 U.S.C. § 101

As noted above, claims 19 and 20 stand rejected under 35 U.S.C. § 101 for allegedly lacking utility. Without commenting substantively on this ground of rejection, Applicant notes that the rejection of claims 19 and 20 is moot in view of the cancellation of these claims without prejudice or disclaimer.

¹ Applicant notes that Garrison apparently qualifies as prior art under 35 U.S.C. § 102(e).

Claim Rejections - 35 U.S.C. § 102

A. Claims 1-4, 8-13 and 17-20 (Sawada)

Claims 1-4, 8-13 and 17-20 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Sawada. Applicant respectfully traverses.

Notwithstanding the Examiner's rejection, Applicant submits that Sawada fails to anticipate all the features of claim 1. For instance, claim 1 defines a network system for connecting a plurality of terminal devices via an agent module comprising, *inter alia*, one of the terminal devices; and the agent module disposed between a network and the one of the terminal devices, for relaying an access from the one of the terminal devices to the network. Further, claim 1 requires the agent module includes a request signal transmission section for transmitting to the one of the terminal devices a request signal requesting to establish an information transmission enabled state between the one of the terminal devices and the agent module, the request signal including identification information to identify the agent module.

In the grounds of rejection, the Examiner analogizes computer terminal 20 of Sawada as the previously recited terminal device, and gateway apparatus 12 of Sawada as the claimed agent module. As demonstrated below, the computer terminal 20 and gateway apparatus 12 of Sawada cannot properly be relied upon to teach the recited one of the terminal devices and the agent module of the network system for connecting a plurality of terminal devices via an agent module, as defined by claim 1.

For instance, there is no suggestion that the gateway apparatus 12 of Sawada sends any “access request” to any terminal apparatus. Rather, as clearly taught by Sawada, a *client device* (i.e., a WWW (World Wide Web) browser) sends an access request to gateway apparatus 12, which functions as a WWW server. Indeed, Sawada teaches that a home device (e.g., video camera 24 or lamp 34) is operated from a terminal, or WWW browser on a wide area network (WAN) or on the home network, by the terminal acting as a client device that transmits an access request to the gateway server 12. *See* Sawada at col. 10, lines 40-49. Moreover, Sawada explicitly states that “*when an access request is received from a client* (WWW browser) (step 150), an entry of the user-ID and password prompted.” *See* Sawada at col. 10, lines 46-48 (emphasis added). Then, according to Sawada, “the user enters those IDs.” *See* Sawada at col. 10, lines 48-49.

Further, Sawada plainly teaches that the client, and not the gateway, supplies request information. To wit, Sawada teaches, “[m]ore specifically, it is desireable [*sic*] to let the client supply information including the Authorization header simultaneously, strictly determine the authenticity of the ID entered by this and strictly limit accesses to the home network (step 512).” *See* Sawada at col. 10, lines 50-54.

As clearly evidenced by the foregoing, there is no suggestion that the gateway apparatus 12, which the Examiner analogizes to the claimed agent module, transmits a “request signal requesting to establish an information transmission enabled state between the one of the terminals devices and the agent module, the request signal including identification information to

identify the agent module”, as required by claim 1. Thus, Sawada cannot reasonably be interpreted to teach all the features of claim 1.

In addition, Applicant notes the above arguments are equally applicable to independent claims 8, 9, 17 and 18, which similarly recite the feature of the agent module transmitting a request signal to the terminal device, as respectively defined by these claims. Thus, for similar reasons, Sawada cannot properly be relied upon to anticipate all the limitations of claims 8, 9, 17 and 18. Accordingly, reconsideration and withdrawal of the rejection of independent claims 1, 8, 9, 17 and 18 is requested. Further, claims 2-7 and 11-16 are believed to be allowable at least by virtue of depending from claims 1 and 10, respectively.

Also, Applicant notes that claim 1 further recites the feature of the one of the terminal devices includes a first determination section for determining whether the agent module which has transmitted the request signal is an agent module to which the one of the terminal devices receiving the request signal is to be connected. However, in Sawada, the user-IDs are sent not by the gateway apparatus 12, but by the computer terminal 20 as clearly evidenced above.

Moreover, while Sawada discloses that gateway apparatus 12 is assigned IP address "192.168.10.1" (*see* Sawada at column 5, lines 24-26), Sawada is silent regarding any transmission of the ID of the gateway apparatus 12 to the computer terminal 20. Furthermore, Sawada does not teach or suggest that the computer terminal 20 makes any determination based on the ID of the gateway apparatus 12. Accordingly, Sawada does not teach a first determination section, as recited in claim 1. For similar reasons, Applicant submits that Sawada does not teach

the feature of “determining whether the agent module is an agent module to which the one of the terminal devices is to be connected”, as recited by claim 10.

B. Claims 1-2, 8-11 and 17-20 (Garrison)

As noted above, claims 1-2, 8-11 and 17-20 stand rejected under 35 U.S.C. § 102(a) as allegedly being anticipated by Garrison. Applicant respectfully traverses.

As demonstrated below, Garrison fails to teach or suggest *at least* the feature of “the request signal including identification information to identify the agent module”, as recited by claims 1, 8-10, and 17 and 18. In this regard, Applicant notes that the Examiner analogizes server 17a and database system 19a of Garrison to the claimed agent module and the previously recited terminal device, respectively. Further, the Examiner analogizes the alias password of Garrison to the claimed identification information, and further analogizes the request of Garrison to the claimed request signal. *See* Office Action at pages 6 and 7.

In stark contrast to the claimed request signal, Garrison merely teaches that a client 14 establishes a connection with server 17a before the client 14 issues a request command to the database system 19a (i.e., a connection between the client and the server). Then, when the server 17a receives a request command for data from the client 14 after the connection is established between client 14 and server 17a, the server 17a establishes connection with the database system 19a in response to the request command. *See* Garrison at col. 6, line 60 - col. 8, line 25.

However, as taught by Garrison, the alias password is “associated with the user of the

client 14 when accessing the databases 20a and 20b within database system 19a.” *See* Garrison at col. 8, lines 22-25. Further, Garrison teaches that the alias password is assigned to the user and stored in a password table at each of the servers 17a and 17b to enable the user to establish communication with the servers. *See* Garrison at col. 10, lines 5-20. Thus, as clearly seen from the foregoing, the alias password of Garrison, which the Examiner analogizes to the claimed identification information, does not identify the server 17a, which the Examiner analogizes to the claimed agent module. There is no suggestion whatsoever that the alias password of Garrison in any way identifies the server. Rather, the alias password of Garrison merely identifies a client. Consequently, Garrison fails to anticipate *all* the limitations of claims 1, 8-10 and 17 and 18.

Indeed, in exemplary embodiments disclosed in the present application, the “client” establishes a connection with a desired terminal device via an agent module before the client issues a request command to the terminal device. If the agent module determines the client as an authorized client, the agent module sends a connection request signal to the terminal device in order to relay the connection. *See, e.g.*, page 29, lines 9-26 in the specification; Fig. 4.

In view of the foregoing, Garrison cannot properly be relied upon to teach or suggest all the limitations of independent claims 1, 8-10 and 17-18. Therefore, reconsideration and withdrawal of the rejection of these claims is requested. Further, claims 2-7 and 11-16 are believed to be allowable at least by virtue of depending from claims 1 and 10, respectively.

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Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Brian K. Shelton
Registration No. 50,245

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

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